

# **EXHIBIT 252**



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John Olson  
Monica Vela-Vick  
David Scalia  
Michael Weitzner

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1 Q Civil penalties as a sovereign and as a parens  
2 patriae?

3 A Correct.

4 Q And costs?

5 A That is correct.

6 Q That is the totality of the relief that Indiana  
7 is seeking in this action; correct?

8 A Correct.

9 Q Did Indiana ever -- I'll ask it this way.  
10 Indiana never initiated administrative  
11 proceedings against Google for the conduct  
12 alleged in the fourth amended complaint;  
13 correct?

14 MR. WILKERSON: Objection. Form.

15 A Correct.

16 Q Indiana could have brought these claims against  
17 Google in state court; correct?

18 MR. WILKERSON: Objection. Form.

19 A Well, certainly we could have brought the DTPA  
20 claims in state court. I'm not sure whether the  
21 antitrust claims could have been brought in  
22 state court. I'm not sure about that  
23 jurisdictional question.

24 Q Is Indiana seeking relief under Indiana state  
25 law antitrust claims?

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1 A For an injunctive relief, yes.

2 Q Those claims could have been brought in state  
3 court; correct?

4 MR. WILKERSON: Objection. Form.

5 A Oh, the state antitrust claim? Sure.

6 Q With respect to the parens patriae claims, what  
7 categories of people or entities is the state  
8 seeking relief on behalf of?

9 A We'd probably include publishers, advertisers,  
10 and end users.

11 Q As you sit here today, are you aware of a single  
12 publisher in the State of Indiana that uses  
13 Google ad tech products to sell display  
14 advertising?

15 A Today I cannot identify a particular publisher  
16 or advertiser. But my understanding is that  
17 discovery is still open and that there may be  
18 expert testimony on this issue.

19 Q Does the State of Indiana know how many in-state  
20 publishers use Google ad tech products in  
21 Indiana?

22 A I don't believe so.

23 Q What is the factual basis for the allegations by  
24 the State of Indiana that Google's alleged  
25 conducted harmed publishers in the state of

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1 Indiana?

2 A We believe that the common set of facts which  
3 Texas has testified to would apply to Indiana,  
4 the same as any other state.

5 Q As you sit here today, can the State of Indiana  
6 name a single advertiser in the State of Indiana  
7 that uses Google ad tech products to sell  
8 display advertising?

9 A I can't name a specific advertiser, but I would  
10 just reiterate that with discovery still pending  
11 and with expert testimony to come, there may be  
12 some specific names. In a state of seven  
13 million people, there's bound to be some  
14 publishers and advertisers here.

15 Q Do you know how many publishers or advertisers  
16 in the state -- scratch that, because I already  
17 asked about publishers.

18 Do you know how many advertisers there are  
19 in the state that use Google ad tech products?

20 A I do not know.

21 Q And when I say --

22 A Same comment about discovery and expert  
23 witnesses.

24 Q And when I say "you," you understand I mean the  
25 State of Indiana; correct?

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1 A Of course.

2 Q Does the Office of the Attorney General of the  
3 State of Indiana have the power to issue a civil  
4 investigative demand?

5 A We do.

6 Q And has the Office of the Attorney General of  
7 the State of Indiana issued any civil  
8 investigative demands to any third parties  
9 related to Google ad tech products or display  
10 advertising?

11 A I don't believe so.

12 Q What about end users? How many end users are  
13 there that the State of Indiana contends have  
14 been harmed?

15 MR. WILKERSON: Objection. Form.

16 A I can't possibly come up with a number beyond  
17 telling you that there's seven million people in  
18 the state and a lot of them have computers,  
19 myself included.

20 Q And how would you quantify any harm to somebody  
21 sitting behind a computer, from the allegations  
22 in this case?

23 MR. WILKERSON: Objection. Form.

24 A If they had a paywall from a publisher that they  
25 would not have had but for Google's practices.



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1 If they had to pay a higher price for a paywall  
2 but not for Google's practices. If they didn't  
3 see as many ads as might give them better, I  
4 guess, shopping experience.

5 I think there are a number of ways that end  
6 users would be adversely affected.

7 Q A publisher sets its own price for its paywalls;  
8 correct?

9 A Presumably based on its total costs, among other  
10 things.

11 Q Do you know if there are any -- and I apologize  
12 if I asked this question already.

13 Do you know if there are any ad tech  
14 competitors in Indiana to Google's products?

15 MR. WILKERSON: Objection. Form.

16 A I don't know for a fact. I assume there are,  
17 but I don't know that for a fact.

18 Q As you sit here today, is the State of Indiana  
19 alleging harm to Google's competitors in the  
20 state of Indiana?

21 A Well, certainly not in this lawsuit.

22 Q So the State of Indiana is not seeking any  
23 remuneration for Google's competitors in the  
24 state of Indiana by this lawsuit; correct?

25 MR. WILKERSON: Objection. Form.

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1 STATE OF INDIANA )  
 ) SS:

2 COUNTY OF HAMILTON )

3 I, Janine A. Ferren, a Notary Public in and  
4 for the County of Hamilton, State of Indiana at  
5 large, do hereby certify that STEVEN TATERKA, the  
6 deponent herein, was by me first duly sworn to tell  
7 the truth, the whole truth, and nothing but the  
8 truth in the aforementioned matter;

9 That the foregoing deposition was taken on  
10 behalf of the Defendant, at the offices of Office  
11 of the Attorney General, Indiana Government Center  
12 South, Fifth Floor, Indianapolis, Marion County,  
13 Indiana, on the 25th day of April 2024, commencing  
14 at the hour of 1:09 p.m., pursuant to the Federal  
15 Rules of Civil Procedure;

16 That said deposition was taken down  
17 stenographically and transcribed under my  
18 direction, and that the typewritten transcript is a  
19 true record of the testimony given by the said  
20 deponent; and thereafter presented to said deponent  
21 for his signature;

22 That the parties were represented by their  
23 counsel as aforementioned.

24 I do further certify that I am a disinterested  
25 person in this cause of action; that I am not a

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1 relative or attorney of any party, or otherwise  
2 interested in the event of this action, and am not  
3 in the employ of the attorneys for any party.

4 IN WITNESS WHEREOF, I have hereunto set my  
5 hand and affixed my notarial seal on this 26th  
6 day of April 2024.

7  
8   
9

10 Janine A. Ferren  
11  
12

13 Seal, Notary Public

My Commission Expires:

14 State of Indiana

April 22, 2024

15 Janine A. Ferren

County of Residence:

16 Commission No. NP0681591

Hamilton  
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The State Of Texas, Et Al. v. Google LLC

Steven Taterka (#6657993)

E R R A T A S H E E T

PAGE 33 LINE 14 CHANGE

The word "charter" should be "chartered"

REASON Transcription error

PAGE 85 LINE 16 CHANGE

The word "reserved" should be "reserve"

REASON Transcription error

PAGE LINE CHANGE

REASON

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Steven Taterka

May 21, 2024

Date

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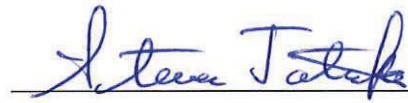
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1 The State Of Texas, Et Al. v. Google LLC

2 Steven Taterka (#6657993)

3 ACKNOWLEDGEMENT OF DEPONENT

4 I, Steven Taterka, do hereby declare that I  
5 have read the foregoing transcript, I have made any  
6 corrections, additions, or changes I deemed necessary as  
7 noted above to be appended hereto, and that the same is  
8 a true, correct and complete transcript of the testimony  
9 given by me.

10   
11 \_\_\_\_\_

12 Steven Taterka

11 May 21, 2024

12 Date

13 \*If notary is required

14 SUBSCRIBED AND SWORN TO BEFORE ME THIS

15 \_\_\_\_\_ DAY OF \_\_\_\_\_, 20\_\_\_\_.

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19 NOTARY PUBLIC  
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